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February 28, 2022

VIA ECF and Email

The Honorable Analisa Torres United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 Torres\_NYSDChambers@nysd.uscourts.gov

Re: Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela,

Case No. 1:21-cv-02678-AT

Dear Judge Torres:

On behalf of our client, plaintiff Syracuse Mountains Corporation in the above referenced case, we respectfully submit this status letter regarding service of process pursuant to your Honor's January 28, 2022 Memo Endorsement, Dkt. 31.

By way of background, we submitted to the Clerk of the Court the necessary documents for service upon defendant Bolivarian Republic of Venezuela in accordance with Section 1608(a)(4) of the Foreign Sovereign Immunities Act, which the Clerk then transmitted to the Department of State on May 21, 2021, as noted in our June 14, 2021 status letter to the Court, Dkt. 20, and the Clerk's Certificate of Mailing, Dkt. 19.

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We have been in regular contact with the Department of State since that time. On

February 10, 2022, the Department of State informed us in the attached email thread that the

documents for service were transmitted to the Bolivarian Republic of Venezuela on February 9,

2022. The Department of State further explained:

We are waiting to get the certified copy of the diplomatic note of transmittal, which may take a few more days, but once that is

finalized, our office will be returning it with a confirmation letter to

the court.

The Department of State, in a different message in the same attached email thread, agreed to

provide counsel for Syracuse with a copy of the confirmation letter being sent to the Court, and a

copy of the diplomatic note of transmittal. We have continued to follow up with the Department

of State, however we have not yet received these documents. Attached to this filing is a copy of

our most recent correspondence.

Our understanding is that service of process is complete, and the Court should expect a

confirmation letter from the Department of State shortly. We will promptly notify the Court

when we receive further confirmation of service from the Department of State.

Respectfully,

/s/ Michael DeBernardis

Michael DeBernardis

Attachment